



OXFORD ENVIRONMENTAL, INC.

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October 3, 1997

210576



Mr. Eric Wilson  
On Scene Coordinator  
U.S. EPA, Region II  
ERRD/RAB (MS-211)  
2890 Woodbridge Avenue  
Edison, NJ 08837

Re: Revised Drum Disposal Plan, Cornell-Dubilier Site, South Plainfield, New Jersey

Dear Eric:

In response to your fax today, attached is the revised drum disposal plan for your review and approval.

If you have any questions about the plan, please contact me by phone at 973-244-0600 or fax at 973-244-0722.

Very Truly Yours,

OXFORD ENVIRONMENTAL, INC.

Gary T. Boyer, P.E.

project engineer

Enclosures

cc: John Hendry, Lara Coraci



# Cornell- Dubilier Electronics Site

## Drum Sampling, Analysis and Disposal Plan

Revised October 3, 1997

### Introduction

Nine drums have been staged in the fenced area of the former Pepe's Truck Driving School at the site. Old drums are either overpacked, or loose material has been shoveled into steel 55 gallon drums. The drums have been marked with spray painted numbers, and are listed as follows:

Drum	Description
1	Overpacked, old 55 gallon steel drum. Bung top. From former New Brunswick Roofing area. Full. A black liquid had leaked from it.
2	Overpacked, old 55 gallon steel drum. Bung top. From former New Brunswick Roofing area. Full. A black liquid had leaked from it.
3	Overpacked, old 55 gallon steel drum. Bung top. From former New Brunswick Roofing area. Bulged and less than 10 % full. Labeled Drydene Corp.
4	Overpacked, old 55 gallon steel drum. Bung top. From former New Brunswick Roofing area. Less than 10% full.
5	Overpacked, old 55 gallon steel drum. Open top. From former New Brunswick Roofing area. Full of solids, possibly soil.
6	New 55 gallon steel drum. Open top. Contains spill cleanup from drum ruptured on 9/29/97.
7	New 55 gallon steel drum. Open top. Contains spill cleanup from drum ruptured on 9/29/97.
8	Overpacked, old 55 gallon steel drum or pieces. From toe of slope bordering wetlands.
9	Poly overpacked, old 55 gallon drum or pieces. From toe of slope bordering wetlands.

Four drums of personal protective equipment and decontamination plastic are also present and require sampling and disposal. These drums are not numbered.

### Contractor and Subcontractor Selection

EPA is to be notified of the name, address, qualifications and responsibilities of contractors and subcontractors selected to perform the work described in the plan a minimum of two days before the start of the work. EPA retains the right to disapprove any or all contractors or subcontractors selected.

### Sampling

Only OSHA 40 hour trained workers, familiar with drum sampling, will be used. Level B personal protective equipment will be worn while opening drums for sampling. After an overpack or new drum is opened with a wrench, the lid will be removed and set aside. Next, a photo of the overpacked contents will be taken. Then a bung will be removed with a non-sparking wrench, (slowly, to relieve pressure or vacuum). If bungs are badly rusted or frozen, a hole will be cut in the end of the drum with a non-sparking hydraulic penetrating device. (Operators will stand well back from the drum for safety). During opening, organic vapor concentrations will be monitored with portable instrumentation (OVM). Results will be recorded in a field logbook.

Liquids will be sampled with a clean COLIWASA or open tube sampler. Either dedicated /disposable samplers may be used, or, the sampler will be thoroughly cleaned between drums. Once the drum is

opened, a sample will be retrieved and immediately transferred to a sample bottle. If the sampler is disposable it will be left in the drum. Otherwise, it will be thoroughly decontaminated between drums.

Solids will be sampled with a scoop or trowel, drum thief, or soil auger. Either dedicated/disposable samplers may be used, or, the sampler will be thoroughly cleaned between drums. Once the drum is opened, a sample will be retrieved and immediately transferred to a sample bottle. If the sampler is disposable it will be left in the drum. Otherwise, it will be thoroughly decontaminated between drums.

Personal protective equipment will be sampled by cutting 1/2 inch diameter pieces of the most visibly soiled portions of suits, gloves, and boot covers with a knife or scissors and compositing into one decontaminated stainless steel bowl for mixing. After thorough mixing, aliquots will be transferred to sample bottles. Either dedicated/disposable samplers may be used, or, samplers will be thoroughly decontaminated before and after use.

Samples will be clearly labeled and preserved according to the parameter being analyzed. Chain of custody procedures will be followed.

## Analysis

Samples will be analyzed for the following parameters, using methods from SW-846:

Ignitability

Corrosivity

Reactivity

Toxicity Characteristic Leaching Procedure

PCBs

Analyses will be performed by a New Jersey accredited laboratory. Standard deliverables and turnaround time will be used.

## Disposal

Following receipt of the results of analysis, a final disposal site for the drums will be selected. The final disposal site, not a broker or transporter or storage facility, will be identified for EPA approval.

A copy of waste profiles and supporting documentation are to be submitted to EPA for review two weeks prior to submission to the chosen disposal facility. Following EPA approval, drums will be disposed at the approved site. All applicable rules (e.g., manifests, licensed transporter, licensed disposal) will be followed.

## Schedule

The entire process from start of sampling to finish of disposal is expected to take 9 weeks, broken-down as follows:

Sampling	week 1
Obtaining EPA Generator ID	week 1
Analysis	weeks 2 - 5
Reporting, Selection of Final Disposal Facility	week 6
EPA Approval of Final Facility	weeks 7-8
Transportation and Disposal at Approved Facility	week 9

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-U.S. EPA REGION 2 REPP

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## FACSIMILE REQUEST AND COVER SHEET



**U.S. Environmental Protection Agency**  
**Region 2**  
**2890 Woodbridge Avenue**  
**Edison, New Jersey 08837**

**TO:** Mr. Gary Boyer  
**OFFICE:** Oxford Environmental  
**PHONE:**  
**FAX:** (201) 244-0722

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**FROM:** Eric Wilson  
**OFFICE:** Removal Action Branch  
**PHONE:** (732) 906-6991  
**FAX:** (732) 906-6182  
**DATE:** October 3, 1997  
**SUBJECT:** Cornell-Dubilier Electronics Site  
**Number of Pages (including cover sheet):** 2

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**Message:** EPA comments on Drum Sampling, Analysis and Disposal Plan included.